

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Patent Application

Applicant(s): K. Betz et al.
Docket No.: YO999-547
Serial No.: 09/500,208
Filing Date: February 8, 2000
Group: 2157
Examiner: Ramy M. Osman

Title: Methods and Apparatus for Reducing the Number of Server Interactions
In Network-Based Applications Using a Dual-MVC Approach

REPLY BRIEF

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

The present Reply Brief is in response to the Examiner's Answer dated November 27, 2007, which was issued in response to the Appeal Brief filed by Applicants (hereinafter referred to as "Appellants") dated August 28, 2007 in which the final rejection of claims 1-26 of the above-identified application was appealed.

ARGUMENT

Appellants first address the multiple assertions in the Examiner's Answer that Appellants' arguments in their Appeal Brief fail to comply with 37 CFR 1.111(b), as being nothing more than "mere allegations." Each of Appellants' arguments in their Appeal Brief first expressly mentions the claim language at issue, then expressly points out the portions of the cited reference being relied upon by the Examiner, and then expressly points out how the relied upon portions of the cited reference are deficient with respect to the claim language at issue. Thus, the assertion that this form of argument amounts to "mere allegations" seems to also ignore the substance of the arguments. Appellants' sincerely believe that the arguments are proper and complete.

Turning toward the substance of the Examiner's position, the Examiner's Answer, on page 11, provides an alleged explanation of the Hyndman reference. However, Appellants reiterate what they asserted on page 10 of their Appeal Brief, that is, the Examiner in the final Office Action appears to be suggesting that MVC-2 is a server storing and maintaining a model M-2 and executing view-generating with V-2 and controller logic with C-2, where M-2, V-2 and C-2 are associated with the application, and MVC-1 is a client storing and maintaining at least a subset of the model associated with the application (M-1) and executing at least a subset of the view generating with V-1 and controller logic with C-1 associated with the application. However, Hyndman at column 4, lines 6-8, states that "the view V-2 of MVC-2 is the UIC state information, the model M-2 is the UIS and the controller C-2 is the data marshalling mechanism for the various applications provided in the MN."

Therefore, V-2, as the UIC state information, does not teach or suggest the claimed view-generating logic that is associated with the application and executed by the server, and C-2, as the marshalling mechanism for the various applications provided in the MN, does not teach or suggest the claimed controller logic associated with the application and executed by the server.

Furthermore, the relied-upon portion of Hyndman does not teach or suggest of a client storing and maintaining at least a subset of the model associated with the application and executing at least a subset of the view-generating and controller logic associated with the application. For example, in the relied-upon portion of Hyndman, the only reference to the client side controller

logic, C-1, states that, “UIC comprises one or more mini-controllers C-1 that interact both with the model cache M-1 and the controllers C-2 on the server, to ensure that both models are kept in synchronization” (see Hyndman at column 4, lines 16-19). The relied-upon portion of Hyndman does not disclose the limitation of a client executing at least a subset of the controller logic associated with the application.

Thus, the architecture of Hyndman does not teach or suggest having a server to store and maintain a model associated with the application and to execute view-generating and controller logic associated with the application, and having a client to store and maintain at least a subset of the model associated with the application and to execute at least a subset of the view-generating and controller logic associated with the application.

While the Examiner’s Answer attempts to clarify the assertions made in the final Office Action by specifically referring to the UIC component and the UIS component, the further explanation still does not remedy the deficiencies in the argument that Hyndman teaches or suggests all of the limitations of the independent claims.

Again, the claimed invention recites that the server “store[s] a model associated with the application and maintain[s] view-generating and controller logic associated with the application,” and the client “store[s] at least a subset of the model associated with the application and maintain[s] at least a subset of the view-generating and controller logic associated with the application.”

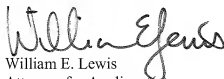
While Hyndman discloses a multilevel model-view-controller (MMVC), Hyndman does not disclose the dual-MVC approach of the claimed invention. That is, among other deficiencies, Hyndman does not disclose having a server to store and maintain a model associated with the application and to execute view-generating and controller logic associated with the application, and having a client to store and maintain at least a subset of the model associated with the application and to execute at least a subset of the view-generating and controller logic associated with the application. The UIC component and the UIS component of Hyndman do not disclose all of the claimed limitations.

Accordingly, Appellants assert that independent claims 1, 13, 25 and 26 are patentable over Hyndman and therefore allowable.

Regarding Appellants' arguments offered in their Appeal Brief for the subject dependent claims, Appellants' reiterate their positions and assert that, for at least those reasons, said dependent claims are patentable over Hyndman and therefore allowable.

In view of the above, Appellants believe that claims 1-26 are in condition for allowance, and respectfully request withdrawal of the §102 and §103 rejections.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William E. Lewis". The signature is fluid and cursive, with the first name "William" being more prominent.

William E. Lewis
Attorney for Applicant(s)
Reg. No. 39,274
Ryan, Mason & Lewis, LLP
90 Forest Avenue
Locust Valley, NY 11560
(516) 759-2946

Date: January 28, 2008